Brian A. Bender, Esq. (BAB-0218) Harris Beach PLLC 100 Wall Street New York, New York 10005 (212) 687-0100

Attorneys for Defendant HUDSON TOWERS HOUSING CO., INC.

IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION 21 MC 102 (AKH)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RODRIGO CAMPOZANO (AND WIFE, ESTHER CAMPOZANO),

Plaintiffs,

-against-

100 CHURCH, LLC, 120 BROADWAY CONDOMINIUM (CONDO #871), 120 BROADWAY HOLDING, LLC, 120 BROADWAY PROPERTIES, LLC, 120 BROADWAY, LLC, 50 TRINITY, LLC, 53 PARK PLACE LLC, 715 REALTY CORP., 88 GREENWICH LLC, 90 CHURCH STREET LIMITED PARTNERSHIP, AJ GOLDSTEIN & CO., ALAN KASMAN DBA KASCO, ALAN L. MERRIL, ALLBRIGHT PARKING MANAGEMENT, INC., AMBIENT GROUP, INC., ANN TAYLOR STORES CORPORATION, BANKERS TRUST COMPANY, BANKERS TRUST CORP., BANKERS TRUST NEW YORK CORPORATION, BATTERY PARK CITY AUTHORITY, BELFOR USA GROUP, INC., BETTY JEAN GRANQUIST, BLACK DIAMONDS LLC, BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. D/BA BMS CAT, BOARD OF EDUCATION OF THE CITY OF NEW YORK, BOARD OF MANAGERS OF THE 120 BROADWAY CONDOMINIUM (CONDO #871), BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, BOSTON PROPERTIES, INC., BROADWAY WEST STREET ASSOCIATES LIMITED PARTNERSHIP, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD

Case No.: 07-CV-4459 (AKH)

NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT OF HUDSON TOWERS HOUSING CO., INC.

Filed 11/30/2007

FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., BT PRIVATE CLIENTS CORP., CAROL GAYNOR TRUST, CAROL GAYNOR, AS TRUSTEE OF THE CAROL GAYNOR TRUST, CAROL MERRIL GAYNOR, CENTRAL PARKING SYSTEM OF NEW YORK, INC., CITIBANK, NA, DEPARTMENT OF BUSINESS SERVICES, DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION, EDISON PARKING MANAGEMNT, L.P., EMPIRE STATE PROPERTIES, INC., ENVIRONTECH CLEN AIR. INC., FGP 90 WEST STREET INC., FRED GOLDSTEIN, GPS ENVIRONMENTAL CONSULTANTS, INC., HARLAND GAYNOR, AS TRUSTEE UNDER A DECLARATION OF TRUST, HAROLD G. GOLDSTEIN, AS TRUSTEE UNDER A DECLARATION OF TRUST, HERMAN L. BLUM, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN. HIGHLAND DEVELOPMENT LLC, HILLMAN ENVIRONMENTAL GROUP, LLC., HUDSON TOWERS HOUSING CO., INC., HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW TOWERS ASSOCIATES, IDELL GOLDSTEIN, AS TRUSTEE UNDER DECLARATION OF TRUST, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., JONES LANG LASALLE AMERICAS, INC., JONES LANG LASALLE SERVICES, INC., KASCO RESTORATION SERVICES CO., KIBEL COMPANIES, LEFRAK ORGANIZATION, INC., LIBERTY VIEW ASSOCIATES, L.P., LIONSHEAD 110 DEVELOPMENT LLC, LIONSHEAD DEVELOPMENT LLC, MARGARET G. WATERS, MARGUERITE K. LEWIS, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, MATTHEW A. GELBIN, AS TRUSTEE OF THE GELBIN FAMILY, MERRILL LYNCH & CO, INC., NATALIE S. LEBOW, AS TRUSTEE OF THE JEREMIAH PHILIP LEBOW REVOCABLE TRUST, NATALIE S. LEBOW, AS TRUSTEE OF THE JERRY P. LEBOW FAMILY TRUST, NEW YORK CITY SCHOOL

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CONSTRUCTION AUTHORITY, NOMURA
HOLDING AMERICA, INC., NOMURA
SECURITIES INTERNATIONAL, INC., PAMELA
BETH KLEIN, AS TRUSTEE OF THE PAMELA
AND ROWLAND KLEIN TRUST, R Y
MANGEMENT CO., INC., RELATED BPC
ASSOCIATES, INC., RELATED MANAGEMENT
CO., LP, ROWAN K. KLEIN, AS TRUSTEE OF THE
PAMELA AND ROWAN KLEIN TRUST, RUTH G.
LEBOW, RY MANAGEMENT, SHIRLEY G.
SHOCKLEY, AS TRUSTEE UNDER
DECLARATION OF TRUST, SILVERSTEIN
PROPERTIES, INC., STEEPLECHASE ACQUISITIO,
ET AL

## Defendants.

PLEASE TAKE NOTICE THAT defendant, HUDSON TOWERS HOUSING CO., INC., as and for its response to the allegations set forth in the amended Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint Adding New Defendants Not Previously Served filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re. World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). HUDSON TOWERS HOUSING CO., INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

PLEASE TAKE FURTHER NOTICE THAT defendant, HUDSON TOWERS HOUSING CO., INC. reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (¶(¶ D (1)-(5)).

WHEREFORE, HUDSON TOWERS HOUSING CO., INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York November 30, 2007

Yours etc.,

HARRIS BEACH PLLC

Brian A. Bender, Esq. (BAB-0218) HARRIS BEACH PLLC

-Attorney for Defendant

HUDSON TOWERS HOUSING CO., INC.

100 Wall Street, 23rd Floor New York, New York 10005

(212) 687-0100

IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RODRIGO CAMPOZANO (AND WIFE, ESTHER CAMPOZANO),

Case No.: 07-CV- 4459 (AKH)

Plaintiffs,

-against-

110 CHURCH LLC, ET. AL

Defendants.

## NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT OF HUDSON TOWERS HOUSING CO., INC.

## HARRIS BEACH, PLLC

Attorneys for Defendant

## HUDSON TOWERS HOUSING CO., INC.

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